



Ascension Soil Company, LLC
1151 Evergreen Parkway
Evergreen, CO 80439
720.840.4703

www.ascensionsoil.com

March 8, 2021

Carmen Rose
Sr. Reclamation Specialist
Mining and Minerals Division
Mining Act Reclamation Program
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

**RE: Request for Additional Information, Minimal Impact Exploration Operation Permit Application
Magdalena Tailings Repurposing, Socorro County, New Mexico**

As per your email dated February 24, 2020, please find responses to your request for additional information for the Minimal Impact Exploration Operation Permit Application for the Magdalena Tailings Repurposing.

Request: Please provide a) a map of the general areas to be explored referencing a nearby town or landmark, and b) more detailed maps of the exploration bore hole locations for each site. Make sure to include north arrows, legends, and legible bore hole labels. Please include any GPS files (e.g. KML, etc.).

Response: The following figures are attached to this letter:

- Figure 1A: Project location in relation to major landmarks and roads
- Figure 1B: Project location in relation of local access roads
- Figure 2A: Soil Boring Locations, Dobson Property in relation to property boundaries
- Figure 2B: Soil Boring Locations, Dobson Property with greater detail.
- Figure 3: Soil Boring Locations, Magdalena South Property

GPS locations will be provided as a KML file via email under separate cover.

Request: Will access include crossing any lands owned by entities not listed under Section 2.B. Surface Estate Owners?

Response: All access is via public roads as shown on Figure 1B. For access for the Dobson Property, the Mineral Lease and Purchase Agreement under Section 1 B (i) provides that Lessee shall have the free, unrestricted and uninterrupted right of access, ingress and egress to the Premises over existing roads or alternate routes approved by Lessor and the right to enter upon and occupy the Premises for all

purposes reasonably incident to exploring for, developing, mining etc. For access to the Magdalena South Property, the road to the parking lot is open to public use.

Request: You indicate in Section 4.D. Disposal of Drill Tailings that excess drill cuttings will be disposed of at each drilling location. Please describe how the excess drill cuttings will be disposed of at each location (i.e. will the cuttings be placed back into the holes, on the surface, etc.).



Response: Due to the small volume of material to be removed from each borehole collected with a hand auger (less than one liter), and the nature of the waste material discussed below, the excess tailings will be returned to the boring and raked to match the surrounding surface. As described below, only bare surfaces will be disturbed during borehole advancement.

Request: Are any road improvements or modifications expected on the main access roads?

Response: No access road improvements will be undertaken. All sites are drivable with standard vehicles, although a 4WD is recommended to access the Dobson Property.

Request: Section 6.D. Exploration Borehole Abandonment does not include a description of how the boreholes will be reclaimed after exploration. Please describe how you plan on reclaiming the open boreholes after drilling.

Response: The mine waste to be sampled on the Dobson property will be outslope material that is presently devoid of any vegetative cover except for pioneer trees towards the bottom of the slope (Plate 1, Figure 2b). Sample locations will be located on those areas without vegetation. Due to the presence of coarse material and the slope being at the angle of repose, the boreholes will naturally collapse on themselves from upslope material. The disturbed area will be raked to match the surrounding surface. Tailings associated with the Magdalena South Property has dispersed grasses cover with approximately 50% vegetative cover (Plate 2, Figure 3). Boreholes will be located on those areas without vegetation. Following sampling, excess material will be placed back in the boring and the disturbed soils raked to match surrounding surface. Seeding will not be undertaken as part of reclamation as no vegetative cover will be disturbed. Less than one liter of material is anticipated to be removed from each borehole. Assuming that surface disturbance around each borehole is no more than 36 square inches, 30 disturbed locations equates to approximately 7,000cm² (0.7m²) at each property.

	
<p>Plate 1: Mine waste outslope material to be sampled for the Dobson Property showing the site devoid of vegetations.</p>	<p>Plate 2: Vegetative surface of reclaimed tailings of the Magdalena South Property showing approximately 50% cover.</p>

Request: Section 7.A. Salvage/Preservation of Topsoil describes that no topsoil will be salvaged prior to exploration. Will exploration occur exclusively on surfaces without any topsoil (i.e. exposed, unreclaimed tailings piles)?

Response: As described in the previous response, bare areas associated with mine waste only will be disturbed. Topsoil is not anticipated to be present during sampling and topsoil salvage will not be undertaken.

Request: 19.10.3.302.D(6) NMAC states that the application shall include a general description of how the operation will be operated and reclaimed to meet the requirements of reclamation, as defined in 19.10.1.7 NMAC. Section 7.E. Reclamation Timeline states that no reclamation will be undertaken and the applicant does not commit to reclamation in a timely fashion. MMD will require all drill hole disturbances to be restored as nearly as possible to their original condition through borehole plugging, recontouring, raking, scarification, and/or seeding. Please describe how you will reclaim the bore holes, and provide a timeline for when reclamation will commence after exploration.

As described in previous responses, bare surfaces only will be disturbed. Reclamation activities, including backfilling with excess borehole material and raking to match surrounding bare surfaces will be undertaken immediately upon sample collection. Seeding will not be undertaken as no vegetative cover will be disturbed. Exploration and sampling activities, including reclamation, will be completed within one week.

If you have additional questions, please contact me at 720.840.4703.

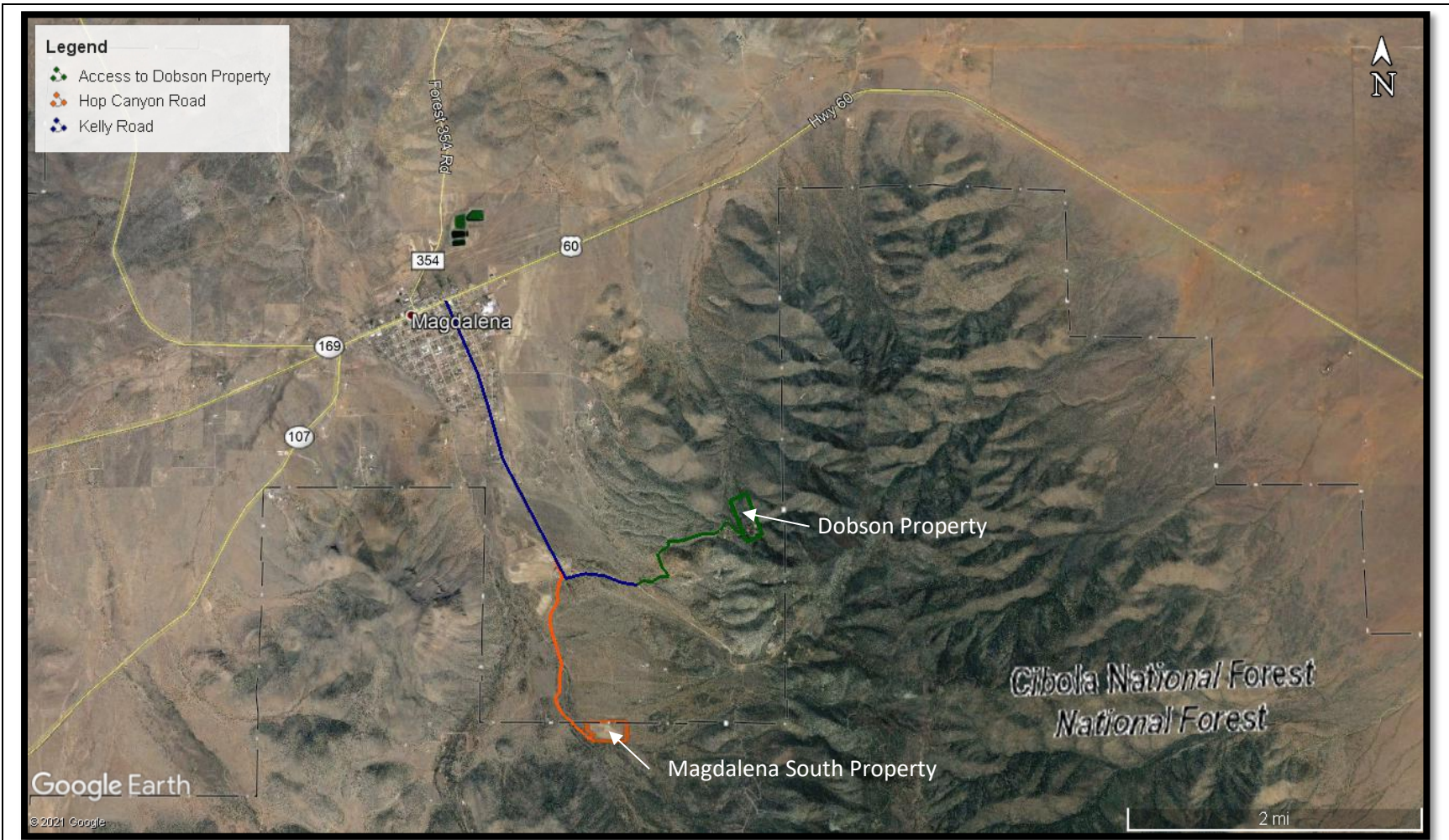
Sincerely

A handwritten signature in blue ink, appearing to read "A. D. Harley".

Andrew D. Harley, PhD
CEO and President
Senior Geochemist



<p>NOTES: Base layer exported from Google Earth.</p> <p>Data for graphical presentation only. The data is not suitable for other purposes or uses.</p>	<p>PREPARED BY: Ascension Soil Company, LLC 1151 Evergreen Parkway Evergreen CO 80439</p>	<p>PREPARED FOR: Americas Tailings 7902 Glen Ridge Drive Castle Pines CO 80108</p> <div data-bbox="1075 1224 1184 1328" style="text-align: center;"> </div>	<p>TITLE: PROJECT LOCATION</p>	
		<p>PROJECT: MAGDALENA TAILINGS REPURPOSING</p> <p>LOCATION: SOCORRO COUNTY, NEW MEXICO</p>	<p>DATE: MARCH 8, 2021</p> <p>FIGURE: FIGURE 1A</p>	



NOTES:
Base layer exported from Google Earth.

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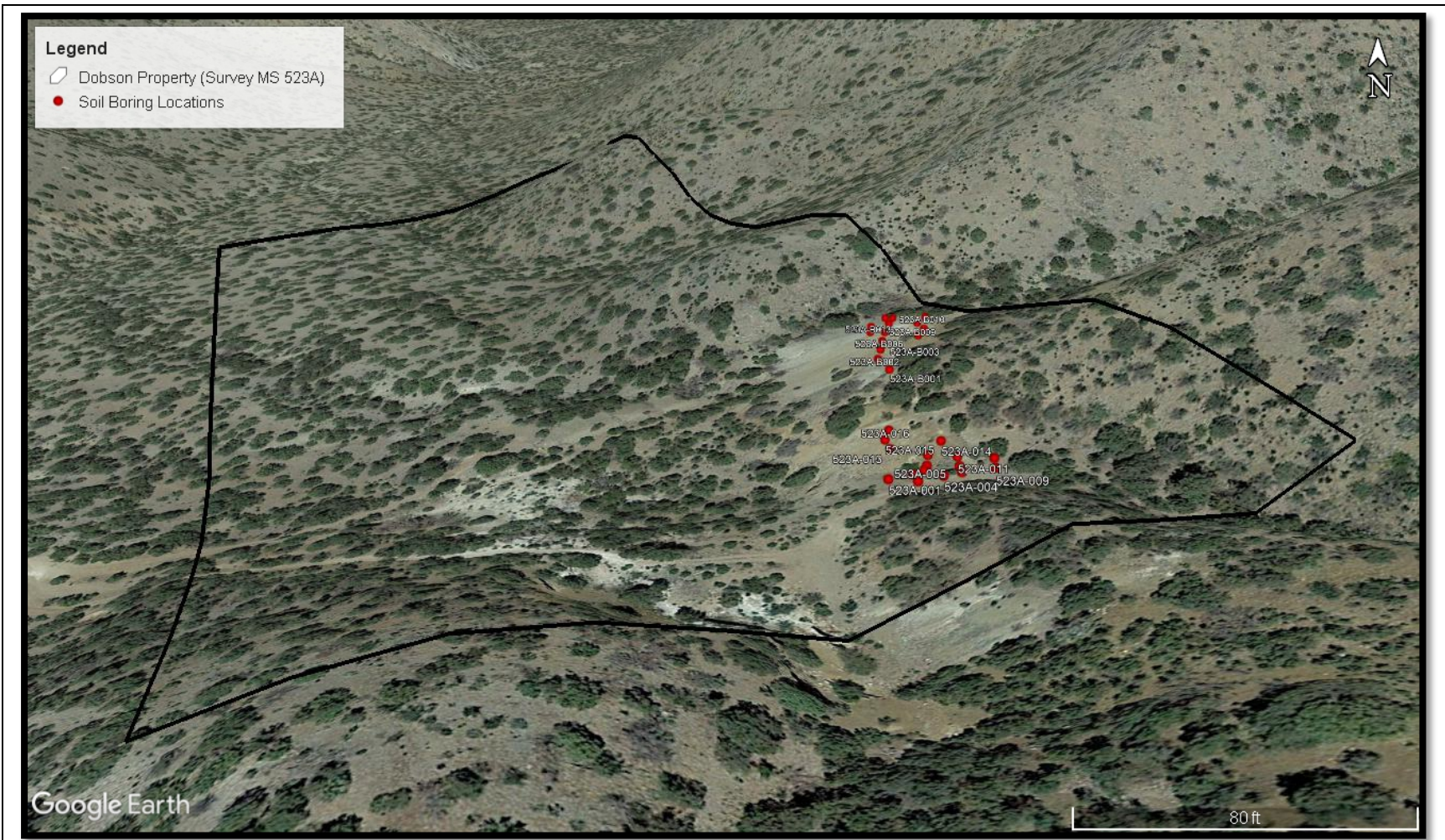
PREPARED FOR:
Americas Tailings
7902 Glen Ridge Drive
Castle Pines CO 80108



TITLE:
PROJECT LOCATION AND ACCESS

PROJECT: MAGDALENA TAILINGS REPURPOSING
LOCATION: SOCORRO COUNTY, NEW MEXICO

DATE: MARCH 8, 2021
FIGURE: **FIGURE 1B**



NOTES:
 Base layer exported from Google Earth.

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 Evergreen CO 80439

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TITLE: PROPOSED SOIL BORING LOCATIONS, DOBSON PROPERTY	
PROJECT: MAGDALENA TAILINGS REPURPOSING	DATE: MARCH 8, 2021
LOCATION: SOCORRO COUNTY, NEW MEXICO	FIGURE: FIGURE 2A



NOTES:
 Base layer exported from Google Earth.

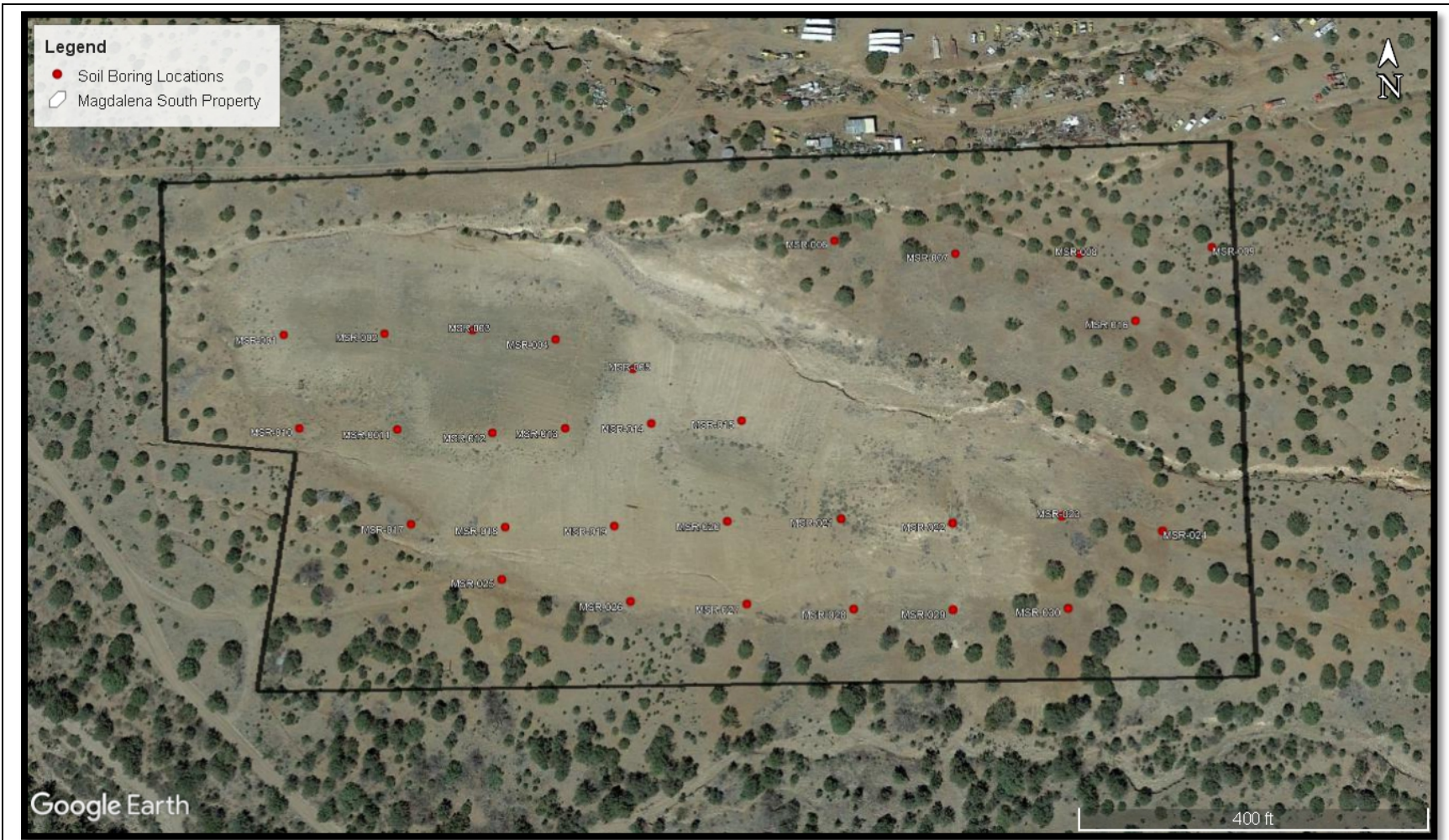
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TITLE: PROPOSED SOIL BORING LOCATIONS, DOBSON PROPERTY	
PROJECT: MAGDALENA TAILINGS REPURPOSING	DATE: MARCH 8, 2021
LOCATION: SOCORRO COUNTY, NEW MEXICO	FIGURE: FIGURE 2B



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			<p>PROJECT:</p> <p>MAGDALENA TAILINGS REPURPOSING</p>	<p>DATE:</p> <p>MARCH 8, 2021</p>
			<p>LOCATION:</p> <p>SOCORRO COUNTY, NEW MEXICO</p>	<p>FIGURE:</p> <p>FIGURE 3</p>

